

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

DENNIS GROMOV, individually and on behalf of all others similarly situated,)	Case No. 1:22-cv-06918
)	Hon. Franklin U. Valderrama
Plaintiff,)	
)	Magistrate Judge Gabriel A. Fuentes
v.)	
)	
BELKIN INTERNATIONAL, INC.,)	
)	
Defendant.)	

DECLARATION OF BRADLEY F. SILVERMAN

I, BRADLEY F. SILVERMAN, declare:

1. I am counsel to the law firm of Finkelstein, Blankinship, Frei-Pearson & Garber, LLP, attorneys for plaintiff Dennis Gromov (“Plaintiff”). I have been admitted *pro hac vice* to represent Plaintiff in the above-captioned action. *See* ECF No. 18. I make this declaration in opposition to the motion of defendant Belkin International, Inc. (“Defendant”) to compel disclosure and for the entry of a confidentiality protective order (ECF No. 80).

2. I have personal knowledge of the following facts and, if called upon as a witness, could and would competently testify thereto, except as to those matters which are explicitly set forth as based upon my information and belief and, as to such matters, I am informed and believe that they are true and correct.

3. Annexed hereto as Exhibit 1 is a true and correct copy of a proposed “Stipulation Regarding Battery Inspection” provided by counsel for Defendant on January 26, 2024.

4. Annexed hereto as Exhibit 2 is a true and correct copy of a “Stipulation Regarding Battery Inspection” entered into by the parties in the action entitled *Miley v. Belkin International, Inc.*, Case No. 20STCV00033 (Cal. Super. Ct., L.A. County). This stipulation includes an Attachment C that is a detailed “Power Bank Testing Test Plan” prepared by Torus Engineering,

LLC for the counsel representing Defendant in the *Miley* action.

5. Annexed hereto as Exhibit 3 is a true and correct copy of the Expert Declaration of Michael Pecht, Ph.D. in Support of Plaintiff's Motion for Class Certification submitted in the *Miley* action.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 22, 2024 in Irvington, New York.

/s/ Bradley F. Silverman
BRADLEY F. SILVERMAN